

EXHIBIT “D”

From: GARY LIGHTMAN garylighman@lightmanlaw.com 

Subject: Fwd:

Date: March 29, 2024 at 10:17 PM

To: Patrick Healey phealey@rebarkelly.com

Cc: Kim DiTomaso kditomaso@lightmanlaw.com, Glenn Manochi gmanochi@lightmanlaw.com, GARY LIGHTMAN ltag8r@me.com

Bcc: Dan Scully Dans@thesafetyhouse.com, Andrea B. Carter ABCARTER@nycourts.gov, Brian Gubelli brian.gubelli@nassauda.org

G

Patrick,

REALLY?

You produce 18 pages of documents for the Zekaria Defendants, and 16 of them are meaningless crap?

Zekaria has repeatedly told us that she has documents showing that she distributed all of the money that was wired into her attorney escrow account? We know that \$2,351,950 was wired into Zekaria's escrow account, but the documents produced do NOT account for all of that \$2,351,950.

Where is the retainer agreement signed in February 2022, between Zekaria and Weiss, that Weiss testified to in his 2/16/24 deposition, and that you repeatedly have promised that Zekaria would produce? (Zekaria as a NY attorney is required to have a written retainer agreement with her clients)

Where are the documents (and metadata) showing the transmittal of that retainer agreement from Zekaria to her client, and then back to her?

Where are all of the emails to and from Zekaria, and (a) Manfred Sternberg, and (b) Sam Gross, and (c) Gary Weiss?

Where are all of the texts between Zekaria, and (a) Manfred Sternberg, and (b) Sam Gross, and (c) Gary Weiss?

Where are the documents evidencing the attorney fees Zekaria billed or charged? And the documents showing the fees that she received was paid or retained from the wire proceeds or gemstones?

Where are the documents showing each of the actual wires Zekaria made from her attorney escrow account? (an attorney is required to keep such writings)

Where are the documents evidencing the instructions to Zekaria from her client for each of the distributions that Zekaria made from her attorney escrow account? (an attorney is required to keep such writings)

Where're the documents evidencing the "directions of the Sternberg Defendants" that Zekaria references in ¶ 188 of the Zekaria Answer to the Complaint [ECF 119]?

Where're the documents evidencing the "direction and agreement of the Weiss Defendants" that Zekaria references in ¶ 188 of the Zekaria Answer to the Complaint [ECF 119]?

Where re the documents pertaining to Gary Weiss's purchase of the iHealth covid test kits? And his pickup of those test kits? And pertaining to the delivery of the test kits?

Where are the documents evidencing any due diligence, let alone the required due diligence, pertaining to Weiss's actual possession of the test kits, prior to Zekaria's release of any funds from her escrow account?

Where are the emails, and texts, and other documents, pertaining to the \$4 million in gemstones

that Gary Weiss gave to Sam and Manfred as collateral, including the 4 diamonds that Zekaria got from Weiss in the Starbucks coffee shop in NYC?

Where is the Zekaria Privilege Log setting forth and describing the redactions you made to the documents produced, and also setting forth any documents withheld and not produced?

Where are the written responses of the Zekaria Defendants to the Document Requests?

I could expect something like this from Sam Gross, but Zekaria is a licensed and practicing attorney, and she should know better than to play discovery games.

PLEASE, PLEASE STOP STALLING, AND COMPLY WITH THE DISCOVERY OBLIGATIONS OF THE ZEKARIA DEFENDANTS UNDER THE RULES OF COURT, AND PRODUCE ALL OF THE DOCUMENTS RESPONSIVE TO THE DOCUMENT REQUESTS SERVED ON THE ZEKARIA DEFENDANTS.

When can we expect the written responses of the Zekaria Defendants to the Document Requests, and when can we expect you to produce the rest of Zekaria's documents that are responsive to the Document Requests?

pls advise, asap

thx
Gary Lightman
cell 215-760-3000

Begin forwarded message:

From: Patrick Healey <phealey@rebarkelly.com>
Date: March 29, 2024 at 4:34:21 PM EDT
To: Gary Lightman <garylighman@lightmanlaw.com>



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We are pleased to announce that our New York office has relocated, and therefore our address has changed.

Please note, our New York office address is now:

256 West 36th Street
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